



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

July 19, 2024

Via ECF

The Honorable George B. Daniels  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *In re Terrorist Attacks of September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

We write respectfully on behalf of the Federal Bureau of Investigation (“FBI”) to clarify one point regarding the compromise to which the FBI agreed with the Plaintiffs’ Executive Committees (“PECs”), which was described in the PECs’ July 18, 2024 letter. ECF No. 10132. By limiting the FBI redactions at issue to those relating to 30 individuals in documents cited in the parties’ briefs and averments, the compromise will significantly narrow the number of redactions that the Court will need to evaluate for potential unsealing under *Lugosch*. However, the Court will still need to review those redactions and consider whether they should be unsealed. The compromise proposal will allow the PECs and the FBI time to identify those redactions remaining at issue and provide the Court with an *in camera* set of materials for review, which should significantly reduce the Court’s burden but not relieve it altogether.

We thank the Court for its consideration of this submission.

Respectfully,

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cc: all counsel (by ECF)